

**Exhibit A**  
*(May 3, 2022 Production Letter)*



**Michael A. Parente**  
Associate

May 3, 2022

**DELIVERED VIA EMAIL**

Christopher Bryant  
Boroughs Bryant LLC  
1122 Lady St. Ste. 208  
Columbia, SC 29201

*Re: S.C. State Conf. of the NAACP and Taiwan Scott v. Alexander, et al.,  
Docket No. 3:21-cv-03302-MBS-TJH-RMG (D.S.C.)  
House Defendants' Sixteenth Production*

Dear Chris:

Austin  
Charleston  
Charlotte  
**Columbia**  
Greensboro  
Greenville  
Bluffton / Hilton Head  
Myrtle Beach  
Raleigh

On behalf of Defendants James H. Lucas (in his official capacity as Speaker of the South Carolina House of Representatives), Chris Murphy (in his official capacity as Chairman of the South Carolina House of Representatives Judiciary Committee), and Wallace H. Jordan (in his official as Chairman of the South Carolina House of Representatives Redistricting Ad Hoc Committee) (collectively, the "House Defendants"), we are producing a sixteenth set of documents to Plaintiffs. The production is being made pursuant to the Panel's April 13, 2022 Order (ECF No. 222) directing the production of communications such as personal email accounts and text messages. This production is made pursuant to the protest and reservations previously noted on the basis of legislative privilege. This contains additional text messages from Chairman Chris Murphy, which were inadvertently left off the fifteenth production made on Saturday April 30, 2022. After Mr. Moore reviewed the list of potential exhibits to be covered in Representative Murphy's deposition tomorrow (these were sent by Ms. Ramer late last night), we realized that 18 arguably responsive text communications were omitted from this weekend's production. Mr. Moore called Ms. Ramer immediately and those documents were produced directly to Ms. Ramer at 11:33 AM today.

In addition, this production has been loaded to the FTP site for all counsel of record for Plaintiffs and the previously enumerated counsel for defendants. If counsel for the other defendants request that we provide copies of the productions to additional counsel, please let us know. The production includes 18 documents totaling 18 pages Bates

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**Attorneys and Counselors at Law**

May 3, 2022

Page 2

labelled **SC\_HOUSE\_0110879 – SC\_HOUSE\_0110896**. There are 18 redactions made on the basis of non-responsiveness to Plaintiffs' Requests for Production.

In addition, we intend to provide a production later today with the personal communications of Representative Jason Elliot. We will be providing a copy of this letter to the Panel in a filing today.

Please let us know if you have any questions or concerns.

Sincerely,

A handwritten signature in blue ink, appearing to read "M. Parente", is written over a light blue rectangular background.

Michael A. Parente

cc: Counsel of Record